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BY THE COMPTROLLER GENERAL

Report To The Congress OF THE UNITED STATES

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How To Make Special Emphasis Programs An Effective Part Of Agencies' EEO Activities.

Special emphasis programs--such as the Federal Women's Program and the Hispanic Employment Program--have expanded in the Federal Government. These programs hold the promise of being an effective means of advising agency management on the special needs of underrepresented groups.

However, GAO found that agency managers and special emphasis program coordinators often have different perceptions of the appropriate role and duties of a coordinator. Further, special emphasis program activities are not included in affirmative action plans and there is little accountability for their activities.

To make sure that special emphasis programs are doing those things that need to be done, the Office of Personnel Management should provide additional technical guidance and assistance to help agencies effectively plan for and evaluate special emphasis program activities.

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COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

B-199810

To the President of the Senate and the
Speaker of the House of Representatives

This report points out the need for integrating the activities of special emphasis programs with the overall equal employment opportunity objectives of the Federal services. We made this review to determine how these programs were being implemented and to determine what contribution they were making in improving the employment opportunities for minorities and women.

We are sending copies of this report to the Director, Office of Management and Budget; the Director, Office of Personnel Management; and the Chair of the Equal Employment Opportunity Commission.

James B. Heath
Comptroller General
of the United States

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COMPTROLLER GENERAL'S
REPORT TO THE CONGRESS

HOW TO MAKE SPECIAL EMPHASIS
PROGRAMS AN EFFECTIVE PART
OF AGENCIES' EEO ACTIVITIES

D I G E S T

Special emphasis programs--focusing on the interests of women and minorities--can play an important role in a Federal agency's equal employment opportunity (EEO) efforts. For these programs to be effective, agency management and special emphasis program coordinators need a clear understanding of the work they are to do, how they are to do it and with what resources, and how their activities will fit into the agency's overall EEO goals. (See p. 6.)

Special emphasis programs were established in Federal agencies because women and minorities perceived that their needs were not being adequately considered or met in existing EEO programs. There are five Government-wide programs:

- The Federal Women's Program,
- The Hispanic Employment Program,
- The Selective Placement Program for the Handicapped,
- The Minority Outreach and Upward Mobility Program, *encl*
- The Veterans Employment Program. (See p. 1.)

Other special emphasis programs have been established within individual agencies. GAO's review focused on the Women's and Hispanic Programs, the most widespread. (See p. 3.)

The number and types of special emphasis programs have grown rapidly. While data on the dollar costs of these programs are sketchy, GAO estimates that annual salary cost of coordinators for the Women's and Hispanic Program is over \$29 million. The number of full-time and collateral-duty coordinators and committee

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members for the Federal Women's Program alone increased from about 5,000 in 1977 to about 10,000 in 1979. (See p. 3.)

Little is known about how effective these programs have been in serving the needs of their constituents and helping agencies meet EEO goals. GAO found that:

- Special emphasis program goals need to be integrated into agencies' overall EEO goals.
- Special emphasis programs are loosely operated and do not set out specific goals, resource requirements, timetables, program costs, and activities. There is no accountability for resources invested compared to achievements obtained.
- Top management's participation in and commitment to special emphasis programs vary greatly.
- Definition of the expected role of coordinators is not clear.
- Program evaluations for determining the effectiveness of special emphasis programs and coordinators need to be made. (See pp. 16 to 21.)

COORDINATOR ROLE NEEDS TO BE DEFINED

Special emphasis program coordinator role and activities should vary according to the special needs or problems of a particular agency or its geographic location. However, in all cases, GAO believes coordinators and agency management must have a clear understanding of what is expected. (See p. 11.)

The Federal Government does not have a single set of policies, regulations, and instructions that apply to all special emphasis programs. The guidance that does exist was intended for a specific program; however, GAO found that these guidelines were being adapted for use by other programs. As a result, there is confusion over the coordinator role and program goals. (See p. 11.)

At first, the Office of Personnel Management (OPM) intended coordinators to serve as the principal staff adviser to management about their constituents' problems and the focal point for program direction. Later, OPM broadened the coordinator role to include active participation in recruiting, counseling, and training activities as well. (See pp. 6 to 8.)

Agency officials and coordinators have different views about the appropriate coordinator role:

- Some management officials and coordinators believe that coordinators should actively participate in recruiting, counseling, and training, as well as serve as advisers and the focal point for their constituents' needs.
- Others feel that the coordinator role should be restricted to advising management and that coordinators should not become active recruiters, counselors, and trainers. (See pp. 10 to 11.)

Differences over the appropriate role of coordinators stem, in part, from the fact that guidance on the roles and activities of coordinators for the Women's and Hispanic Programs have been issued piecemeal over a number of years. Furthermore, criteria for determining when special emphasis program coordinators are needed and whether they should serve full-time or on a collateral-duty basis are vague. (See pp. 6 to 8.)

RECOMMENDATIONS

The Director, OPM, should

- review the range of roles and activities that special emphasis program coordinators are now performing;
- determine the appropriate role and activities;
- publish Government-wide guidelines on their roles and activities which can apply to all special emphasis program coordinators;

- provide additional technical assistance and guidance to agencies in setting up special emphasis programs and publish and disseminate "model" agency program plans and activities; and
- establish and publish criteria in the Federal Personnel Manual for appointing and selecting coordinators. (See pp. 11 to 12.)

BETTER MANAGEMENT OF SPECIAL EMPHASIS PROGRAMS NEEDED

Special emphasis programs are intended to be an integral part of agencies' overall affirmative action plans. However, special emphasis programs rarely have plans, and agencies affirmative action plans generally do not include special emphasis program activities. Furthermore, neither special emphasis program plans nor affirmative action plans are adequate planning documents, because they do not set out program goals, resource requirements, and accountability of agency managers and coordinators for program activities. (See pp. 16 to 18.)

Line management and agency officials generally do not participate in planning for special emphasis programs. Planning--and the participation of agency management in the process--is essential to the success of special emphasis programs. (See p. 18.)

Evaluations of special emphasis programs are seldom made. Consequently, some coordinators are inactive, there is no feedback on problems, and progress toward achieving program goals is not reported. (See pp. 18 to 20.)

RECOMMENDATIONS

The Director, OPM, should prepare criteria to help agencies establish a management system applicable to all special emphasis programs. The management system should require

- the setting of program goals,
- the planning of activities to meet goals within established time frames,

--the establishing of program evaluation criteria and accountability on the part of agency managers and coordinators for program costs and activities, and

--the reporting of special emphasis program activities and progress to top-level management and line managers to keep them apprised of goals, milestones, problems, and accomplishments. (See pp. 20 to 21.)

Once agencies have established management systems for special emphasis programs, OPM should include in its annual report to the Congress the cost of operating these programs and their accomplishments. (See p. 21.)

AGENCY COMMENTS

OPM generally agreed with GAO's findings, conclusions, and recommendations but expressed a concern that the estimated cost of the program was inflated. GAO believes the cost estimate is not inflated because it considers only the salary cost of coordinators and does not include the salary or the operation costs that agency managers, committee members, or employees expend on these programs. (See app. II.)

The Equal Employment Opportunity Commission agreed with the GAO report and said that it stands ready to assist OPM and agencies to carry out GAO's recommendations. (See app. III.)

C o n t e n t s

		<u>Page</u>
DIGEST		i
CHAPTER		
1	INTRODUCTION	1
	Scope of review	3
2	SPECIAL EMPHASIS PROGRAM COORDINATOR ROLE NEEDS TO BE CLARIFIED AND BETTER CRITERIA ARE NEEDED FOR APPOINTING COORDINATORS	6
	Evolution of OPM policy on the coordinator role	6
	Wide variances noted in what should be the appropriate role and activities of coordinators	9
	Conclusions	11
	Recommendations	11
	Better criteria for appointing and selecting coordinators are needed	12
	Conclusion	15
	Recommendations	15
3	BETTER MANAGEMENT OF SPECIAL EMPHASIS PROGRAMS IS NEEDED	16
	Need for special emphasis program plans	16
	Program evaluations of special emphasis programs is needed	18
	Conclusions	20
	Recommendations	20
	Agency comments	21
APPENDIX		
I	Estimate of salary costs for coordinators of Women's and Hispanic Programs	23
II	Letter dated July 22, 1980, from the Office of Personnel Management	24
III	Letter dated July 25, 1980, from the Equal Employment Opportunity Commission	25

ABBREVIATIONS

FPM	Federal Personnel Manual
OPM	Office of Personnel Management
EEO	equal employment opportunity
FPM	Federal Personnel Manual
GAO	General Accounting Office
OPM	Office of Personnel Management

CHAPTER 1

INTRODUCTION

The primary purpose of special emphasis programs is to insure that particular constituent groups (minorities and women) are employed and advanced within Federal agencies on a nondiscriminatory basis. These programs usually obtain status on the basis of civil rights and other legislation which bar discrimination because of race, color, religion, sex, national origin, handicap, and age.

Five Government-wide special emphasis programs established by the Civil Service Commission, the predecessor of the Office of Personnel Management (OPM), are the Federal Women's Program; the Hispanic Employment Program; the Selective Placement Program for the Handicapped; the Minority Outreach and Upward Mobility Program; and the Veterans Employment Program.

Several non-Government-wide special emphasis programs have also been established within certain individual agencies. For example:

- Black Affairs Program, at the Department of Justice.
- Black Employment Program, at the Department of the Air Force.
- Asian American Program, at the Drug Enforcement Administration, Department of Justice.

Most of the special emphasis programs have two common features:

- They were established because it was perceived that the existing equal employment opportunity (EEO) programs were not adequately taking into consideration the needs of their constituent groups.
- They are to be integrated into agencies' overall EEO programs.

The legislative authority for Federal special emphasis programs is principally contained in the Equal Employment Opportunity Act of 1972 (Public Law 92-261). The Civil Service Reform Act of 1978 (Public Law 95-454) provided an additional mandate which stresses special emphasis program activities by creating the Federal Equal Opportunity Recruitment Program which

- established the general criteria for determining underrepresentation of minorities and women in the

Federal work force as well as the general criteria for determining underrepresentation in categories (grades, positions, and occupational series) of Federal employment and

--required Federal agencies to conduct a continuing program to eliminate underrepresentation by recruiting from minority communities, educational institutions, and other sources.

OPM provides leadership to the agencies in implementing special emphasis programs. Its staff acts as a central liaison and develops regulations and guidelines for these programs which Federal agencies are required to follow. This material is published in the Federal Personnel Manual (FPM) system which is the official medium of OPM for issuing its personnel regulations and instructions, policy statements, and related material on Government-wide personnel programs to other agencies.

Agency heads have the overall responsibility for implementing the programs. The actual operations of the programs are carried out within agencies through a network of coordinators and committees.

Special emphasis program coordinators ^{1/} are appointed on a full-time or a collateral-duty basis. Full-time coordinator positions--classified as Equal Opportunity Specialist (Classification Series 160)--are usually staffed through the competitive selection process. Full-time coordinators are usually employed at the agency headquarters level, except that some agencies have full-time coordinators at major component organization levels and in some regions.

Collateral-duty coordinators are selected by agency management officials. Collateral-duty coordinators do special emphasis program work in addition to doing their regular duties. OPM guidelines indicate that 20 percent of a collateral-duty coordinator's worktime may be used on special emphasis program activities. The FPM Letter 713-37, dated

^{1/}OPM's Handbook for the Federal Women's Program, dated August 1979, changed the title "coordinator" to "manager." OPM officials said that plans were also underway to change the title to "manager" for other programs, such as the Upward Mobility and Hispanic Programs. For the purpose of this report, we will use the title "coordinator" for the person serving as the focal point for special emphasis programs.

May 20, 1977, identifies some of the criteria for skill, knowledge, and duties of coordinators. However, no grade or occupational series have been established for collateral-duty coordinators; therefore, they can be any grade and from any occupational series.

Some special emphasis programs are assisted by advisory committees, such as the Women's Advisory Council. Committee members are generally elected by employees. Each agency determines how much worktime may be allotted to advisory committee duties. Committee members are not accountable to special emphasis program coordinators; therefore, they are not responsible for special emphasis program activities.

The estimate of Federal expenditures for special emphasis programs has grown in recent years. For example, the estimated number of full-time or collateral-duty coordinators and committee members for the Women's Program has doubled in 2 years--from an estimate of 5,000 in 1977 to an estimate of 10,000 ^{1/} in 1979. Similarly, in 1977 there were an estimated 1,100 full-time or collateral-duty Hispanic program coordinators, but by 1979 that estimate had nearly doubled to 2,150. Government-wide cost data for special emphasis programs in dollar terms is, at best, sketchy; however, an extremely rough estimate of the annual coordinator salary cost for the Women's Program and the Hispanic Program is over \$29 million.

SCOPE OF REVIEW

We focused our review on the Women's and Hispanic Program activities because these programs formally exist Government-wide, have received a lot of attention, and represent a considerable cost.

--The Federal Women's Program dates back to 1961 when the President appointed the Commission on the Status of Women. In 1963 the Civil Service Commission recommended this program. In 1967 the President issued Executive Order 11375, which amended Executive Order 11246, to ban sex discrimination in addition to discrimination based on race, color, religion, and national origin in Federal employment. The Civil Service Commission responded by establishing the Federal Women's Program to enhance employment and advancement opportunities for women.

^{1/}Included in this estimate are about 5,000 Women's Program coordinators who have program responsibility and about 5,000 Women's Advisory Council members who voluntarily serve on the Council.

--The Hispanic Employment Program was established by the Civil Service Commission in 1970 after a recommendation of a White House task force. A November 5, 1970, White House memorandum announced this program's creation and outlined 16 points to be addressed.

We reviewed the role and activities of coordinators in contributing to the agencies' special emphasis programs and EEO programs, how agencies determined the need for coordinators and for which groups, and how the coordinators were being managed. Although our review excludes other programs, such as the Veterans Employment Program and the Selective Placement Program for the Handicapped, ¹/ we believe the concepts and principles discussed in this report are applicable to all special emphasis programs.

We requested information on Hispanic and Women's Programs from headquarters officials and learned that complete data on the number of coordinators and committees and their locations was not readily available. We therefore asked agency officials to help us select coordinators to provide us with information on these programs. As a result of this selection, between March and September 1979, we visited 42 Hispanic and Women's Program coordinators, 33 EEO and agency management officials at 10 headquarters and 13 field locations in Baltimore; Los Angeles; New York City; and Washington, D.C. We also interviewed individuals from Headquarters, Department of Commerce; Headquarters, Department of Defense; Headquarters, Department of Health and Human Services; Headquarters, Department of Justice; OPM; Bureau of the Census; Department of Commerce, the Departments of the Air Force and the Navy; Social Security Administration, Department of Health and Human Resources; and Drug Enforcement Administration, Department of Justice.

In these organizations we met with officials responsible for carrying out the Hispanic and Women's Programs; we examined available documentation on regulations, policies, procedures, and guidance; we reviewed coordinators' recorded activities in carrying out program goals; and we reviewed agency reporting and accountability systems for managing coordinators' activities.

¹/We have issued two recent reports on the handicapped: "Federal Employment of Handicapped People" (FPCD-78-40, July 6, 1978) and "Making Public Buildings Accessible to the Handicapped: More Can Be Done" (FPCD-80-51, June 6, 1980).

Agency headquarters officials, and especially those familiar with EEO programs, said the information we obtained on coordinators' activities is consistent with coordinators' activities throughout the agencies.

CHAPTER 2

SPECIAL EMPHASIS PROGRAM COORDINATOR ROLE NEEDS TO BE CLARIFIED AND BETTER CRITERIA ARE NEEDED FOR APPOINTING COORDINATORS

We found that the more recent OPM guidelines have broadened the role of program coordinators, that differences exist in agency management's perceptions of the appropriate role for coordinators, and that coordinators' own perceptions of their role differ from managers as well as among coordinators.

In general, agency management and EEO directors believe the coordinators' role is to advise management about the concerns of underrepresented groups; to help prepare affirmative action plans; and to insure that recruiting, counseling, and training activities take into consideration their constituents' needs. However, coordinators generally see their role as doers; that is, recruiters, counselors, trainers as well as advisers to management.

Special emphasis programs can serve a very useful purpose to both the underrepresented groups and agency management. Although we believe the coordinator role and activities can and should vary according to the special needs and problems of the particular agency or its geographical location, coordinators need a clear understanding of what is expected of them. This understanding should exist between top agency management, line managers, and the coordinators.

EVOLUTION OF OPM POLICY ON THE COORDINATOR ROLE

OPM policies, guidance, regulations, and instruction on the coordinator role and activities have been issued over the past 10 years. As noted, OPM issues guidance for Government-wide special emphasis programs through the FPM system. Part 713 of FPM, supplement 990-1, includes guidance on the appointment and organizational placement of the Women's Program; however, it does not include any guidance on the Hispanic Program; nor does it provide any guidance for special emphasis programs which have been established in individual agencies, such as the Black Affairs Program in the Department of Justice, the Black Employment Program in the Department of the Air Force, and the Asian American Program in the Drug Enforcement Administration.

OPM policies and guidance on the role and activities of the Women's Program coordinators are set out in five documents:

- FPM Letter 713-8, January 25, 1968, provided the initial guidance on the role and activities of the Women's Program coordinators and also delineated agency management's responsibilities to the program. This document stated that the role and activities of coordinators include assuring comprehensive action plans, evaluating agency programs, representing agencies at public and private groups, recommending special studies, and coordinating the activities of various segments of the organization.
- FPM Letter 713-15, February 27, 1970, superseded that part of FPM Letter 713-8 which deals with the organizational placement of the Women's Program and required that coordinators be assigned to the staff of the director of EEO and that action plans for the Women's Program be made an integral part of agencies' overall EEO program.
- FPM Bulletin 171-405, October 30, 1973, provided information for implementing the Women's Program and broadened the role and activities of the coordinators to include educating supervisors and employees, publicizing the Women's Program, surveying the need for child-care centers, and receiving and monitoring discrimination complaints based on sex.
- FPM Letter 713-37, May 20, 1977, provided guidance for both the Women's and Hispanic Programs on (1) documenting collateral-duty time spent on special emphasis programs, (2) writing position descriptions for full-time and collateral-duty coordinators, and (3) establishing skills and knowledge qualifications and duties of coordinators. This letter has been interpreted by some agency management officials and some coordinators as restricting the role and activities of coordinators to evaluators, advisers, and recommenders, but not doers. (This interpretation is generated by the use of such terms as "facilitates contacts between managers and women's or Hispanic * * * community group," "participates in planning agency recruiting efforts," and "assures effective counseling exists * * *".)
- Federal Women's Program Handbook, August 1979, provided detailed guidance for full-time and collateral-duty coordinators. It changed the name from Federal Women's

Program coordinator to Federal Women's Program Manager and, in general, broadened the role and activities of the Federal Women's Program Manager to that of a doer.

OPM policy and guidance on the role and activities of Hispanic Program coordinators are set out in three documents.

--FPM Letter 713-18, January 23, 1973, provided the initial policy and guidance on the role and activities of Hispanic Program coordinators and also delineated agency management's responsibilities for the program.

--The Guidebook for Hispanic Employment Coordinators, July 31, 1974, provided guidance for the coordinators on how to do their jobs and broadened the role and activities of Hispanic Program coordinators to include serving as analysts, educators, planners, recruiters, and advisers.

--FPM Letter 713-37, May 20, 1977, provided guidance on documenting collateral-duty time spent on the program, writing position descriptions, and establishing skills and knowledge qualification and the role and duties of coordinators. As in the Women's Program, some agency management officials and some coordinators have interpreted this document as restricting the coordinator role to that of advisers, evaluators, and recommenders.

No specific Federal guidance exists on the appropriate role and activities for non-Government-wide special emphasis programs established in individual agencies, such as the Black Affairs Program. Therefore, agency management officials and program coordinators for these programs have their own interpretations of the appropriate coordinator role and activities.

Although Government-wide special emphasis programs are similar in nature and in their overall goal, that is, improving the employment position of the various groups, the role and activities of the Women's Program coordinators have been described differently from those of Hispanic Program coordinators. Therefore, agencies assume that the role and activities of one program apply to those of other programs.

We believe that some of the variances in coordinators' role and activities that we observed in our study are attributable to differences in agencies' interpretation of OPM's guidelines.

WIDE VARIANCES NOTED IN WHAT
SHOULD BE THE APPROPRIATE
ROLE AND ACTIVITIES OF COORDINATORS

We met with 42 special emphasis program coordinators at various levels in 10 departments and agencies included in our review. Lists of their activities were either provided to us by coordinators or developed by us from discussions with them and from reviews of their records. Data for our selected period July 1, 1978, to June 30, 1979, was not uniformly available. We believe, however, that the data we obtained fairly represented a year's period of activity.

Agency headquarters officials, and especially those familiar with special emphasis programs, said the information we obtained about coordinator activities is consistent with coordinator activities throughout the agencies. The coordinators we met with were involved in a broad and varied range of about 290 activities, including

- advising management about special emphasis program activities;
- participating in the development and implementation of agencies' affirmative action plans;
- attending EEO and personnel training courses and meetings;
- recruiting new employees and attending career days and job fairs at local high schools, colleges, and universities;
- staffing job information centers;
- counseling fellow employees regarding discrimination, career development, and personal matters;
- planning, sponsoring, and conducting various employee activities;
- compiling statistics about the agency work force; and
- preparing reports to management on activities, such as workshops, seminars, and conventions attended.

The depth and range of coordinators' participation in the above activities varied from agency to agency. Two examples follow:

--The Air Force requires the Women's Program, Hispanic Program, and Black Employment Program coordinators to actively participate in the recruiting and hiring of qualified women and minorities. The requirement is included in the coordinators' position descriptions.

--The Women's Program and Hispanic Program coordinators at OPM; the Department of Health and Human Services; and the Departments of Commerce, Justice, Navy, and Air Force said they spent time counseling their constituents about career advancement opportunities. They provided information on job openings and training opportunities and on how to apply for them.

A major activity for 22 of the 42 coordinators involves the planning, organizing, and sponsoring of various ethnic celebrations and special observances, such as Black History Week, Hispanic Heritage Week, Asian American Heritage Week, and National Secretaries' Week. These events include such activities as arranging for guest speakers, putting on training workshops, and organizing luncheons.

Information obtained from 30 coordinators showed that they participated in 83 activities in which they had contacted and interacted with various outside groups and officials. Some of these groups are the National Convention of Federally Employed Women, the National and State IMAGE Conventions (a Hispanic employee and community group), the National Black Police Association Conference, the Japanese American Citizen League, and the American Association of University Women.

Some coordinators said that they had established lines of communication with top management by reporting through the EEO officer to top management and occasionally by meeting directly with top management. Other coordinators, however, had not established lines of communication with top management; they reported to someone in their personnel office or the director of EEO. At one agency, top management did not know that Hispanic and Black Employment Programs existed in the agency.

Some agency management officials believed that the special emphasis program coordinator role should be restricted to monitoring, evaluating, advising, and making recommendations to management on employment policies and practices. These officials believed that it is inappropriate for coordinators to participate in or do actual recruiting, counseling, training, and other activities which they view as solely management's responsibilities. They believed that agency management officials, supervisors, personnel specialists, and trained

EEO counselors are best qualified and already have the responsibility for many of the activities in which coordinators are involved. In summary, they believed coordinators should be advisers, but not doers.

Other agency officials believe the opposite; that is, coordinators should get involved and become doers.

Some agency management officials which we interviewed believed the visibility of the special emphasis programs is the most significant benefit being achieved by the wide range of conferences, meetings, contacts, and other activities in which coordinators are involved. One official believed such activities are of marginal value.

CONCLUSIONS

No single body of regulations and instructions defines the role for special emphasis program coordinators. Therefore, both managers and coordinators make assumptions about the coordinator role, believing that the role defined for the Women's Program coordinator also applies to the Hispanic Program coordinator, and vice versa. No Government-wide framework exists for special emphasis programs which have been established in individual agencies, such as the Black Employment Program in the Department of the Air Force.

Consequently, agency management officials and coordinators have different perceptions about the appropriate, or inappropriate, role of coordinators. Some believe that the role is restricted to identifying problems and giving advice whereas others believe the role includes actual participating (doing) in recruiting and counseling as well as identifying problems, giving advice, and making recommendations.

We believe that each agency needs to clarify the coordinator role. Both agency management officials and coordinators should know and agree on what is expected of each other and how coordinators' activities fit into agencies' over-all affirmative action plans. The coordinator role should not remain static but should be flexible to meet new needs and problems. It is important that there is a clear understanding between agency management and coordinators as to what the role and activities should be for any given period of time.

RECOMMENDATIONS

We recommend that the Director, OPM,

--review the range of role and activities the coordinators are performing;

- develop the criteria for the appropriate, or inappropriate, role and activities of coordinators;
- publish Government-wide guidelines on the role and activities applying to all special emphasis program coordinators; and
- provide additional technical assistance and guidance to agencies in setting up special emphasis programs and publish and widely disseminate case studies on effective special emphasis programs.

BETTER CRITERIA FOR APPOINTING
AND SELECTING COORDINATORS ARE NEEDED

OPM guidelines concerning the criteria for appointing special emphasis program coordinators are extremely vague. FPM states that an agency shall designate Women's Program coordinators and others as may be necessary to assist the agency heads.

FPM Bulletin 171-405, October 1973, states that:

"as a general rule, we [OPM] think that an agency employing a total of 7,500 persons should designate a full-time Federal Women's Program coordinator."

In addition, the guidelines state that installations of a significant size should have Women's Program coordinators. The OPM Director, Office of the Federal Women's Program, has issued a pamphlet entitled "Putting Women in Their Place" and the "Handbook for FWP Managers," which provide more specific criteria for appointing coordinators for the Women's Program. However, since the pamphlets in this series are nonregulatory in nature, we recommend that these criteria should be published in the FPM system.

Regarding the Hispanic Program, FPM Letter No. 713-18 states that each agency should appoint coordinators and that agencies should determine the need for coordinators at field offices or installations located in or near Spanish-speaking population centers.

Because the guidelines were vague, each agency has developed its own criteria for appointing coordinators, and therefore criteria agencies used to establish positions coordinator varied greatly. For example:

- Air Force and Navy regulations require appointment of Women's Program and Hispanic Program coordinators at each installation except at locations where women and Hispanics are not available in the labor force.

Naval Sea Systems Command instructions state that shore activities with 1,000 or more civilian employees will have a full-time Women's Program coordinator. A full-time Hispanic Program coordinator is to be appointed if 10 percent of the potential work force in the recruitment area is of Hispanic origin.

--Drug Enforcement Administration guidelines say each regional office should have a collateral-duty coordinator and an alternate for the Women's Program and the Hispanic Program. District offices with 20 or more women should have a collateral-duty Women's Program coordinator and a collateral-duty Hispanic Program coordinator if there are 8 or more Hispanics on the work force.

--OPM internal instructions state that OPM regional directors may designate Women's Program and Hispanic Program coordinators to assist them.

--The Bureau of the Census administrative manual states that the Chief, Personnel Division, will assign women and Hispanic coordinators, as necessary.

According to agency officials, their regulations were primarily a matter of their interpretation of OPM regulations and a reflection of the kind of coverage they want throughout the agency.

Coordinator selection

The guidelines for selecting Women's Program coordinators say that persons designated as coordinators should have empathy for and understanding of the special concerns of women in the employment situation and should be able to communicate effectively with top-management officials and others. FPM Letter 713-37, May 20, 1977, provided guidance on the knowledge, skills, and duties for collateral-duty coordinators.

The guidelines for Hispanic Program coordinators say that, in selecting coordinators, agencies should look for employees with (1) empathy, resourcefulness, good judgment, and a personal commitment to Hispanic Program objectives, (2) knowledge of civil rights and EEO efforts, understanding of Hispanic employment problems, and specific knowledge of EEO regulations, and (3) ability to communicate and deal with different levels of people, gather and analyze data about employment of Hispanics, and develop problem resolutions.

Full-time coordinators are usually selected through a competitive selection process and are generally classified

as Equal Opportunity Specialist (Classification Series 160). Collateral-duty coordinators are selected by agency management officials.

Officials used different methods of selecting coordinators. They often selected coordinators on the basis of their willingness to serve in the position. Evidence was not always available to show that the qualifications stipulated in FPM Letter 713-37, dated May 20, 1977, were considered. Some typical examples of how coordinators are selected follow.

--At Department of Defense headquarters, at the Assistant Secretary (Manpower, Reserve Affairs, and Logistics) level, a full-time Women's Program coordinator was appointed through a competitive selection process. The deputy EEO officer at this level was Hispanic, and it was decided that he could serve as the Hispanic Program coordinator on a collateral-duty basis.

--As required, full-time Women's Program and Hispanic Program coordinators were appointed at the Navy headquarters level. The Navy Material Command also requires that full-time Women's Program and Hispanic Program coordinators be appointed. At the Naval Material Command, however, which employs 85 percent of the Navy's total civilian employees, both coordinator positions have been vacant for over 2 years. Under the Navy's policy, full-time coordinators are selected from individuals responding to vacancy announcements.

--At two Navy activities--the Naval Ordnance Station and the Shipbuilding Conversion and Repair--the Hispanic Program coordinators were selected because they were the only Hispanics in the organizations.

--At the Air Force Department level, the chief EEO officer also serves as the Women's Program coordinator on a collateral-duty basis. The Hispanic Program coordinator position has been vacant at this level for a number of years.

--The Women's Program coordinator at the Department of Commerce headquarters is also performing Hispanic Program coordinator duties because that position is vacant. Commerce was advertising for the headquarters Hispanic coordinator position at the time of our review.

--The Drug Enforcement Administration advertised the Women's Program coordinator, alternate, and assistant

coordinator positions on a competitive basis with the final selection to be made by the regional director. At the time of our review, the Women's Program coordinator position had been vacant for about 1 year.

CONCLUSION

Vague OPM criteria for appointing coordinators for Government-wide special emphasis programs have resulted in differences among and within Federal agencies in deciding (1) when to appoint coordinators and (2) whether coordinators are to be appointed on a full-time or a collateral-duty basis. We believe that the criteria for appointing coordinators for Government-wide special emphasis programs should consider:

- An assessment of underrepresentation in each category (grades, positions, and occupational series) of employment of women and Hispanics agencywide.
- Agency program plans that outline the goals, activities, and resource requirements for these programs.

RECOMMENDATIONS

We recommend that the Director, OPM, prepare criteria for appointing and selecting special emphasis program coordinators, taking into consideration:

- An assessment of underrepresentation of women and Hispanics.
- The skills and knowledge needed to manage special emphasis programs.

We recommend also that the criteria for selecting and appointing coordinators be published in the more directive in nature FPM rather than in handbooks for each program.

CHAPTER 3

BETTER MANAGEMENT OF SPECIAL

EMPHASIS PROGRAMS IS NEEDED

OPM guidelines state that special emphasis program plans should be an integral part of agencies overall affirmative action plans. However, formal plans for special emphasis programs seldom exist, and affirmative action plans appear inadequate as planning documents.

Evaluations of the effectiveness of special emphasis programs and coordinators are not being systematically performed. OPM and agencies need to develop special emphasis program evaluation criteria and to conduct periodic evaluations of special emphasis programs. There is also a need for accountability so that progress can be assessed and corrections can be made.

NEED FOR SPECIAL EMPHASIS PROGRAM PLANS

We reviewed numerous EEO and special emphasis program-related documents, including affirmative action plans and separate special emphasis program documents showing activities to be undertaken by coordinators. None of these documents appeared adequate for planning activities by priority or for approving resources. We were told that approving activities and resources is generally requested on an ad hoc basis.

Most coordinators are involved in developing their organization's affirmative action plan, and they suggest various program objectives and action items for their programs. Action items involving participation of special emphasis program coordinators are general in nature and are often designed to benefit all employees or all minority employees rather than a particular constituent group.

Our analysis of various action items designated for coordinators in affirmative action plans show that coordinators expect to be involved in such activities as

- publicizing their special emphasis programs by meeting with agency officials, supervisors, and employees and providing articles to the activity newspaper;
- meeting periodically with agency management to discuss the needs of their constituents; and

--helping in the recruitment of minorities and women by identifying new sources for recruiting by visiting educational institutions and community organizations.

Neither the affirmative action plans nor the special emphasis program documents require accountability for costs and resources of any of the activities at the headquarters level or other locations included in our review. Using what information was available about costs and resources, however, we made a very rough estimate of the annual salary cost for the Women's and Hispanic Program coordinators and found that the cost was more than \$29 million. (See app. I.)

The purpose of making our cost estimate is to show that the level of resources allocated to special emphasis programs does warrant management's attention, in order to match activities to costs and to help determine the adequacy of resources made available to coordinators.

Some coordinators did have informal lists of activities they wanted to undertake. But the lists did not set forth timetables, resources needed, and program goals. One department headquarters required that its coordinators provide the EEO director with a workplan to include an allocation of personnel and resources, a financial plan, and a statement of major objectives. We found, however, that even this plan was too general to serve as a basis for approving activities.

To insure that special emphasis program plans are included in each agency's overall affirmative action plans, OPM guidelines assigned the function and coordinators to the EEO director's staff.

FPM Letter 713-22, October 4, 1973, pointed out that agencies affirmative action plans

- lacked evidence showing that an assessment of the status of equal employment opportunity in the agency or subordinate organizational unit covered by the plan was made preparatory to plan development,
- made vague general statements rather than specific statements about action items and lacked target dates,
- failed to involve line managers and supervisors in carrying out appropriate plan items,
- failed to allocate adequate resources to the EEO program, and

--lacked goals and timetables in affirmative action plans.

The affirmative action plans that we reviewed did not represent a complete program plan for coordinator activities; did not estimate program resource requirements; and are not, in our view, adequate as a planning document.

We believe it is important that management and coordinators reach an understanding on what is expected of the coordinators and how coordinator activities will be considered in agency decisions. Whatever understanding and agreements are reached should be set out in each special emphasis program plan, which should be integrated into agencies' overall affirmative action plans. Such a plan worked out between management and coordinators should set out program goals, activities, time frames, and resource requirements. Such a plan should require agency management to take an active role in special emphasis program planning and should help coordinators by the attention and management commitment the plan brings to their activities.

Further, we believe that special emphasis program planning which involves management officials, line supervisors, and coordinators is essential to resolving equal employment problems. Coordinators can identify the issues, barriers, and problems. However, in order for special emphasis programs to be effective, agency management officials must agree on what the problems are and participate in setting program goals, in allocating resources, and in holding line managers and coordinators accountable for achieving program activities and goals. As a minimum each program plan should contain

- a statement providing an assessment of the problem,
- a statement of program goals,
- a statement of activities or action items that are to be undertaken to meet the goals,
- long-range and interim target dates or timetables to accomplish activities or action items, and
- a statement of accountability for program activities on the part of agency management officials and coordinators.

PROGRAM EVALUATION OF SPECIAL
EMPHASIS PROGRAMS IS NEEDED

OPM has prepared evaluation agenda to be used by it in evaluating agency personnel programs and agencies

in making self-evaluations. The evaluations are intended to help OPM in carrying out its special emphasis program oversight responsibilities.

We reviewed all of OPM's 1978 reports on its evaluations of agencies EEO functions conducted in two regions. The reports showed little evidence of evaluation of special emphasis program coordinator activities or of their effectiveness.

Also agencies have not developed the means for adequately measuring the effectiveness of special emphasis programs and coordinators.

Management officials at the Drug Enforcement Administration in Los Angeles said that some of the ways they monitored the activities of the special emphasis program coordinators included reviewing written reports from the coordinators and, on occasion, meeting with the coordinators to discuss their activities.

Officials at the Air Force Space and Missile System Organization in Los Angeles and the Long Beach Naval Shipyard said they had no way of measuring the effectiveness of the special emphasis programs or the coordinators. They agreed that they should develop some type of management information system to track program costs and time expended by the coordinators and others for comparison against results.

The commander of the Long Beach Naval Shipyard said that, rather than measure special emphasis program effectiveness, he tried to measure the total EEO program effectiveness in terms of meeting established goals for hiring, training, and career advancement for minorities and women.

Not all coordinators made reports on activities or gave feedback on problems and accomplishments. The reports that were made did not contain common data elements designed for followup. The predominance of information in coordinators' reports concerns (1) training courses, workshops, and conventions attended, (2) recruiting activities, (3) special emphasis program meetings attended, and (4) special projects, such as ethnic celebration activities.

We believe the lack of program evaluation has contributed to some coordinators' inactivity. For instance, our review of the activities of 10 collateral-duty coordinators at the Drug Enforcement Administration regional office, the Long Beach Naval Shipyard, and the Air Force Space and Missile System organization in Los Angeles showed that the coordinators had not maintained records showing the amount of time used in

carrying out their program duties. However, on the basis of discussions with coordinators and EEO officials, it appears that five of the collateral-duty coordinators used only minimal time for coordinator work or were inactive, except for time spent in EEO and special emphasis program committee meetings and in attending training courses and conventions. Coordinators at headquarters do not generally have authority to monitor or evaluate coordinators in field offices.

CONCLUSIONS

Current planning for special emphasis programs and activities of coordinators is inadequate. Program plans that include goals and accountability could improve program efficiency and effectiveness.

Evaluation of special emphasis program problems, progress, and status is generally not being made. Although special emphasis program costs are considerable, agency management officials and coordinators are not accountable for program activities or for their related costs. Reports on accomplishments and problems are not consistently made for program management purposes and systematic program evaluations are seldom made. We believe that sound evaluations could improve program effectiveness.

We believe that special emphasis programs could be improved if:

- Agency management officials would establish special emphasis program plans which identify specific goals. These goals should be dovetailed with agencies' overall affirmative action plans.
- Agency management, supervisors, and coordinators participate in preparing the program plan that would include a statement of the problem, activities planned for a time period, and resource requirements.
- Agency management would monitor and evaluate program effectiveness on the basis of progress made in achieving planned goals and activities.
- Agency management and coordinators are held accountable for performing the activities established in the special emphasis program plan.

RECOMMENDATIONS

We recommend that the Director, OPM, prepare guidelines to help agencies establish management systems applicable

to all special emphasis programs. The systems should require:

1. The setting of program objectives.
2. The planning of activities to meet program goals within established time frames.
3. The setting of program evaluation criteria and accountability for costs and activities of coordinators.
4. The reporting of program activities and progress to top-level management and line managers.

We believe that adopting the above recommendations will allow OPM and agencies to analyze the program and the costs, resource requirements, and progress. Once these systems are in place, OPM should include in its annual report to the Congress a comprehensive review of these programs.

AGENCY COMMENTS

OPM, in commenting on a draft of our report, agreed with our findings, conclusions, and recommendations and said that the report will contribute to strengthening special emphasis programs in the departments and agencies. (See app. II.)

OPM expressed some concern, however, with our estimated cost data for the special emphasis program. OPM felt that the costs may be inflated because not all collateral-duty coordinators spend 20 percent of their worktime on special emphasis program duties. The purpose of our cost data (see app. I) is to provide the Congress with a rough estimate of the magnitude of special emphasis programs. We do not believe the cost estimate is inflated for the total cost of special emphasis programs because it considers only salary cost of coordinators and does not include the salary or operations costs that agency managers, committee members, or employees expend in relation to these programs. We used estimated cost data since currently no accurate cost data exists.

Although the Equal Employment Opportunity Commission does not have direct responsibility for Government-wide special emphasis programs, we requested the Commission to comment because these programs are to be included in the affirmative action plans submitted to the Commission by Federal agencies. Overall, the Commission concurred in our findings and recommendations and said that it is ready to assist in any way possible to assure prompt acceptance and implementation of recommendations.

(See app. III.) However, the Commission pointed out that our recommendation to include special emphasis program plans in each agency's affirmative action plan needs to be further developed.

We believe that OPM and the Commission should get together and develop the best approach to insure that special emphasis program goals, objectives, and progress are considered in each agency's affirmative action plans.

ESTIMATE OF SALARY COSTS FOR COORDINATORS
OF WOMEN'S AND HISPANIC PROGRAMS

<u>Cost item</u>	<u>Average salary</u>	<u>Estimated number of coordinators</u>	<u>Total</u>
Salary costs:			
Federal Women's Program:			
Full-time duty	\$19,163	86	\$ 1,648,018
Collateral-duty	<u>a/3,832</u>	<u>b/5,000</u>	19,160,000
Hispanic Employment Program:			
Collateral-duty	3,832	<u>c/2,150</u>	<u>8,238,800</u>
Total			<u>\$29,046,818</u>

a/Since OPM regulations permit 20 percent of work time to be spent on collateral duty, we used 20 percent of the average salary of full-time coordinators to estimate the cost of the average salary of collateral-duty coordinator.

b/We were told that, of the Federal Women's Program network of 10,000 members, half were coordinators and the other half were committee members. Our report addresses only coordinators, not committee members.

c/The estimate of full-time Hispanic coordinators is very small, therefore, we projected program cost on collateral-duty coordinators only.

APPENDIX II

APPENDIX II

United States of America
**Office of
Personnel Management**
Washington, D C 20415

In Reply, Refer To:

JUL 22 1980

Visual Reference

JUL 31 1980

Mr. H. L. Krieger
Director
U.S. General Accounting Office
Washington, D.C. 20548

Dear Mr. Krieger:

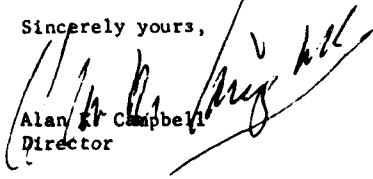
Thank you for giving us the opportunity to comment on your draft report on Special Emphasis Programs.

During our review of the draft report, the staff of the Office of Affirmative Employment Programs was particularly pleased with the cooperation and professionalism demonstrated by the auditors, Mr. Frank Frazier and Mr. Mike Goyszkowicz, who represented GAO during this process. The final report and recommendations, we believe, will contribute to strengthening the Hispanic Employment Program and the Federal Women's Program in the departments and agencies.

Our only concern regarding the report is the cost data reflected in Appendix I. While we recognize the importance of obtaining data on program costs, we question the validity of including in the report data based on estimates. For example: Although OPM guidance recommends that individuals performing special emphasis program duties on a collateral duty basis devote a minimum of 20% of their worktime to program assignments, most agencies do not follow this guidance. As a result, the estimated cost figures shown in Appendix I for collateral duty program personnel may be inflated. Therefore, we recommend that these cost estimates be deleted from the report.

As stated earlier, we appreciated working with your auditors and look forward to receiving the final report.

Sincerely yours,


Alan R. Campbell
Director

APPENDIX III

APPENDIX III



EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
WASHINGTON, D. C. 20506

July 25, 1980

OFFICE OF THE CHAIR

Gregory J. Ahart
Director
Human Resources Division
U. S. General Accounting Office
Washington, D. C. 20548

Dear Mr. Ahart:

We appreciate the opportunity to comment on the GAO draft report entitled "Special Emphasis Programs -- A Need to Assess How They Can Be Improved." While the EEOC has no direct responsibility for government-wide implementation and monitoring of these programs, they nevertheless are viewed with great interest by this agency because they promote equal employment opportunities within the Federal workforce. Also, inasmuch as Special Emphasis Program concerns are intended to be key elements in the Affirmative Action Plans submitted to us by Federal agencies, our interest is a clear one.

We concur with your findings and recommendations regarding the role of Special Emphasis Program Coordinators. There is a pressing need to more sharply focus on the duties and responsibilities of the coordinators. As the report so clearly demonstrates there is confusion and ambiguity regarding proper utilization of a coordinator's talents. The issue of the coordinator as a "doer" rather than an advisor will require careful analysis and thought, as the outcome will impact on all existing employment systems, i.e. recruitment, hiring, training, promotion, and upward mobility. It is our view that the coordinator was intended to facilitate the equal opportunity process by providing guidance, advice and direction to an agency but that actual implementation is a function of management and personnel. In this way a coordinator would be effective by assessing an agency's needs and providing input to planning affirmative action efforts, oversight and evaluation.

We agree with your finding that a more systematic and effective management approach is needed for the Special Emphasis Programs. The recommendation that this be accomplished by requiring each agency to establish Special Emphasis Program Plans which identify specific objectives and goals, including time frames for completion, is a sound one. That these plans be made a part of each agency's Affirmative Action Plan is a vague notion at best; presently special emphasis concerns are incorporated into agency Affirmative Action Plans not as a separate document but as part of

APPENDIX III

APPENDIX III

the overall plan. By regulation agencies are required to submit a Federal Equal Opportunity Recruitment Program Plan (FEORP) as an attachment to their Affirmative Action Plan which incorporates special emphasis action items. Perhaps further coordination of Special Emphasis Program plans, goals and objectives with AAP overall planning would be desirable. This proposal needs further development.

There was one key area identified in the report that was not targeted or recommended for corrective action. It is an area that, in our estimation, must be addressed if the Special Emphasis Programs are to function effectively. As the report noted, government-wide Special Emphasis Programs are similar in nature and in their overall objective -- i. e. to improve the employment position of their group. Yet, confusion abounds on the part of management and coordinators alike as to exact purpose and scope of authority for these programs. There appears to be no single set of policies, rules and regulations that govern all Special Emphasis Programs. Each program has its own set of regulations but they are duplicative, overlapping in scope, and subject to wide-ranging interpretation. In fact, as the report notes, each Special Emphasis Program can and does use the guidance written for other programs. There is a need, therefore, for a uniform body of rules and regulations that set out the general framework of program authority applicable to all Special Emphasis Programs. This framework would make the program objectives consistent, uniform and non-ambiguous. Such a procedural overview would still allow for agencies to tailor their Special Emphasis Programs to individual needs and circumstances.

The area of greatest interest to EEOC when measuring effectiveness of the Special Emphasis Programs, is their level of consistency in providing genuine equal employment opportunities. Their present structure allows for such diverse and inconsistent program application that it is impossible to gauge their real value in enhancing the equal opportunity process. The Special Emphasis Programs have the potential for leading the way in bringing about major systemic change within the Federal workforce. Properly structured and implemented they could well serve as the cornerstone for all future affirmative action accomplishments in government.

We welcome your timely report and generally agree with its conclusions. Although most of the findings and recommendations are directed to OPM, EEOC stands ready to assist in any way possible to assure their prompt acceptance and implementation.

Sincerely,



Eleanor Holmes Norton

(964141)

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